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8 **BEFORE THE**
BOARD OF REGISTERED NURSING
9 **DEPARTMENT OF CONSUMER AFFAIRS**
10 **STATE OF CALIFORNIA**

11 In the Matter of the Statement of Issues
Against:
12 **KRISTI GREENE HUGHES**
13 **749 Orange Ave.**
Lindsay, CA 93247

Case No. *2011-981*

STATEMENT OF ISSUES

14
15 Respondent.

16
17 Complainant alleges:

18 **PARTIES**

19 1. Louise R. Bailey, M.Ed., RN ("Complainant") brings this Statement of Issues solely
20 in her official capacity as the Executive Officer of the Board of Registered Nursing ("Board"),
21 Department of Consumer Affairs.

22 Application Information

23 2. On or about November 22, 2010, the Board Department of Consumer Affairs
24 received an Application for Licensure by Endorsement from Kristi Greene Hughes
25 ("Respondent"). On or about November 12, 2010, Kristi Greene Hughes certified under penalty
26 of perjury to the truthfulness of all statements, answers, and representations in the application.
27 The Board denied the application on February 18, 2011.

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4. Code section 480 states, in pertinent part:

(3)(A) Done any act that if done by a licentiate of the business or profession in question would be grounds for suspension or revocation of a license.

The board may take disciplinary action against a certified or licensed nurse or deny an application for a certificate or license for any of the following:

(4) Denial of licensure, revocation, suspension, restriction, or any other disciplinary action against a health care professional license or certificate by another state or territory of the United States, by any other government agency, or by another California health care professional licensing board. A certified copy of the decision or judgment shall be conclusive evidence of that action.

(Out-of-State Discipline)

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